



July 27, 2015

Reference No. 012636

Mr. Rich Conforti  
MDEQ, OWMRP  
P.O. Box 30241  
Lansing, Michigan  
U.S.A. 48909-7741

**Transmitted via Email**

Dear Mr. Conforti:

**Re: Response to Comments of June 30, 2015  
Comments on Supplemental Groundwater Monitoring Annual Monitoring Report  
March 31, 2014 to April 30, 2015, RACER Former Peregrine, Inc  
Coldwater Road Facility, Genesee Township, Michigan  
MID 000 020 743**

On behalf of Revitalizing Auto Communities Environmental Response Trust (RACER), the following presents responses to the June 30, 2015 Michigan Department of Environmental Quality (MDEQ) comments and questions regarding the "Supplemental Groundwater Monitoring Annual Monitoring Report" submitted to the MDEQ on June 23, 2015 regarding the former Peregrine Coldwater Road Facility (Site) located at 1245 E Coldwater Road in Genesee Township, near Flint, Michigan.

We are available if you would like a meeting or call to discuss our responses. For ease of review, the original comment is presented in *bold italics*, followed by a response.

**DEQ Comment 1:**

***Based on the Monitoring Well Records for Low-Flow Purging presented in Appendix A of the Report, there are several wells where excessive drawdown was documented and stabilization of the water level did not occur within the well screen. These wells include: B-9, PFW-4, MW-18-13, PFW-11, MW-16-1 0, PFW-10, MW-1, and MW-2. In order to collect a more representative sample for analysis, in future sampling events the OWMRP recommends that these wells be purged to dryness followed by sample collection as soon as possible after sufficient recharge occurs.***

**Response:**

Starting with the Q3 2015 event, RACER will purge locations B-9, PFW-4, MW-18-13, PFW-11, MW-16-1 0, PFW-10, MW-1, and MW-2 to dry and collect samples following sufficient recharge of the well but no later than 24 hours after purging. In addition, during the Q3 2015 event, low flow samples will be collected at B-9 and MW-18-13, using the low flow procedure historically used, immediately prior to purging the locations dry and also collect samples following sufficient recharge. These results

will be used to evaluate differences, potentially observed, as a result of the revised sampling procedure.

The remaining locations will continue to be sampled using low flow purging.

**DEQ Comment 2:**

***The Report documents damages to several monitoring wells over the reporting period. The OWMRP recommends that RACER implement procedures to more clearly identify the locations of the monitoring wells, and/or construct protective barriers around the wells to minimize the potential for damages to monitoring wells in the future.***

**Response:**

To clarify: damage at MW-15-10 was due to environmental factors (bulging, apparently a result of extreme cold weather); and, PFW-4 was previously a flush mount well and was modified to allow access to the monitoring location in the event ponded stormwater restricted access. MW-1-02 was apparently struck by a vehicle and the casing was repaired as an interim measure to prevent foreign objects from entering the well; as this location is not part of the monitoring program. To that end, it is recommended that this well be abandoned. In addition to MW-1-02, it is recommended that the wells presented in Figure 1 also be abandoned to prevent any potential tampering or unintentional damage in the future. The wells identified in Figure 1 are not anticipated to be sampled again and they are not needed for gauging to support groundwater level and flow evaluation.

When the effort can be coordinated with other site activity (well abandonment or sampling), RACER will evaluate the need for identification/protective measures for the remaining locations on a well-by-well basis. A summary of any recommended measures will be provided to MDEQ for review and comment.

**DEQ Comment 3:**

***The OWRP approves all of the recommendations proposed by RACER in Section 4.0 of the Report with the exception of the elimination of volatile organics from the monitoring program; these should be retained as specified in the approved Work Plan.***

**Response:**

All the approved recommendations will be implemented starting Q3 2015. Volatile organics will remain part of the monitoring program.

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD

A handwritten signature in blue ink, appearing to read "Michael Tomka". The signature is fluid and cursive, with the first name "Michael" and last name "Tomka" clearly distinguishable.

Michael R. Tomka, P.E.

RC/kf/21

Encl.

cc: Dave Favero/Grant Trigger, RACER  
Joe Rogers/ William Yocum, MDEQ

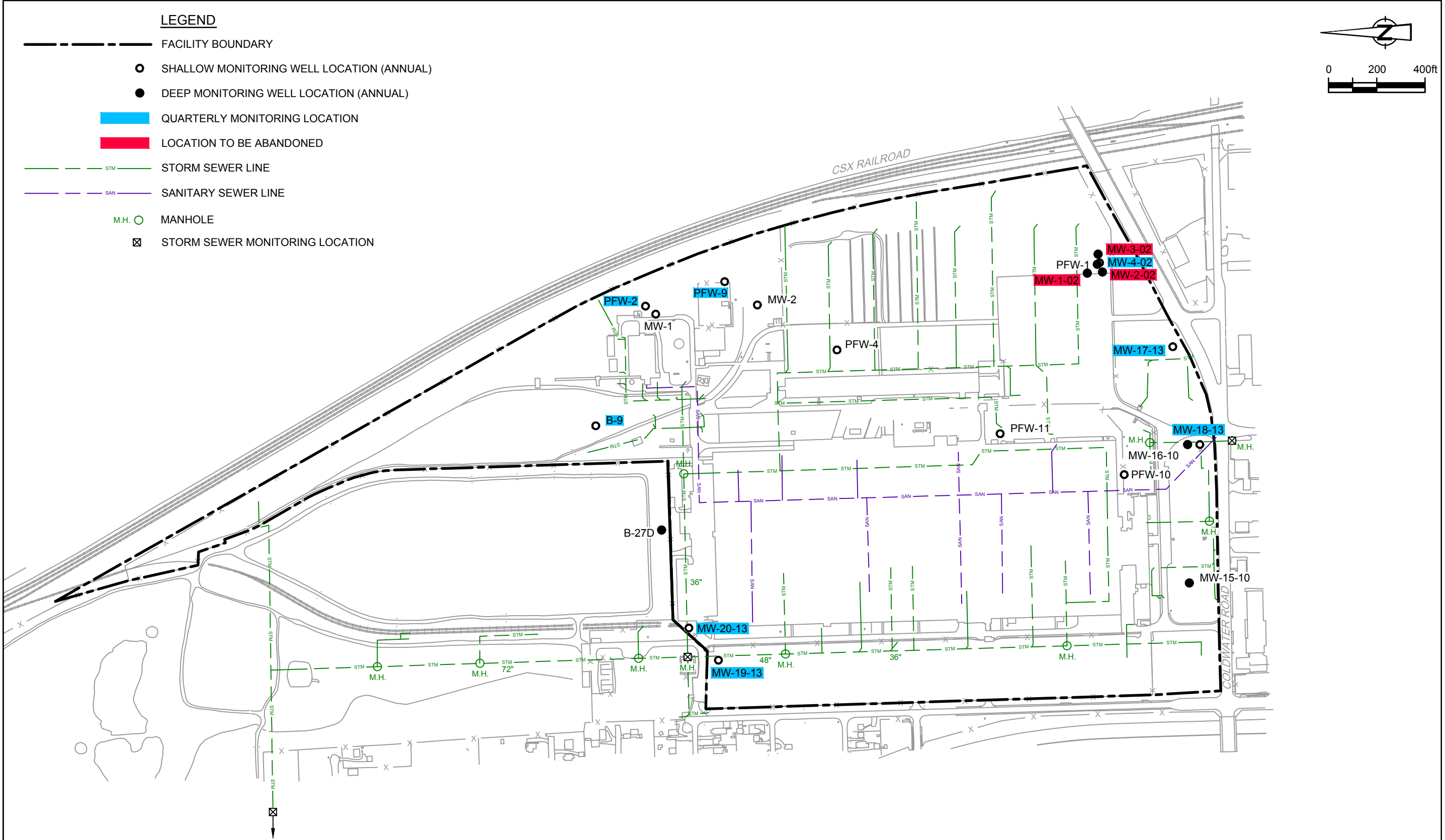


figure 1  
 GROUNDWATER MONITORING LOCATIONS  
 FORMER PEREGRINE (US), INC. COLDWATER ROAD FACILITY  
*Genesee Township, Michigan*

**GHD**  
 NOTE:  
 THIS DRAWING IS FOR REFERENCE ONLY AND IS NEITHER  
 COMPLETE NOR TO EXACTING SCALE.